

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of:

DOCKET TG-220215

FORMAL COMPLAINT OF BASIN
DISPOSAL, INC. AGAINST JAMMIE'S
ENVIRONMENTAL, INC.

PETITION TO INTERVENE
OF PACKAGING
CORPORATION OF
AMERICA

1 **COMES NOW** Packaging Corporation of America (“PCA”) and respectfully petitions to
intervene in the above matter pursuant to WAC 480-07-355, and in doing so alleges as follows:

2 The facility address of PCA is:

Dawn Blancaflor
Packaging Corporation of America
State Highway 12
Wallula, WA
Phone: (208) 859-8981
Email: DawnBlancaflor@packagingcorp.com

3 PCA will be represented in this proceeding by Dawn Blancaflor. All documents relating to
this proceeding should be served to Dawn Blancaflor in electronic format only at the above
email address.

4 PCA is a national pulp, paper, and packaging manufacturing company with manufacturing
facilities located throughout the United States. The company headquarters are located in Lake
Forest, IL.

5 PCA operates an integrated pulp and paper mill, neutral sulfite semi-chemical pulping, an Old

Corrugated Cardboard (“OCC”) facility, and a corrugated medium and box plant in Wallula, Washington (the “Mill”). Primary products include corrugated medium, liner board paper products, and finished containerboard boxes. The Mill has operated at this location since 1958. The Mill and box plant currently employ approximately 590 employees. PCA operates the Wallula facility 24 hours a day, 7 days a week.

6 In March 2021, PCA started manufacturing paper products from OCC. During the OCC process, material that cannot be recycled – such as plastic, steel, tape – is rejected and managed separately (the “OCC Rejects”). OCC Rejects are an industrial waste.

7 PCA currently uses BDI for general garbage collection, transportation, and disposal.

8 PCA currently uses Jammie’s Environmental (“Jammies”) for specialized industrial cleaning and related services, as well as management, transportation, and disposal of the OCC Rejects. As part of the services provided to PCA, Jammies cleans the process equipment in the OCC recycling process and collects for disposal the OCC Rejects that its cleaning activities generate. Jammies crew is onsite daily and works closely with PCA in its day-to-day operations.

9 PCA has a direct and substantial interest in BDI’s filing in this docket as the outcome of the filing will affect the efficiency, the safety, and financial burden on our business. No other party will represent PCA’s direct interests in this matter. Any adjudication with the potential to set requirements for how and who manages PCA’s OCC rejects should include representation from the company itself. Neither party to this action will be able to fully represent the interests of

PCA. Having representation from customers directly impacted by a proceeding (indeed the only customer) is also in the public interest and will also help ensure a complete and accurate record.

10 A corporation such as PCA is included in the definition of “person” in WAC 480-07-340(1)(a). WAC 480-07-355(1)(a) provides that “any person” may file a Petition to Intervene.

11 PCA’s participation as an intervenor in this action will not unreasonably broaden the issues, burden the record, or delay the proceeding.

12 PCA’s position in this action is expected to be in support of the Jammies.

13 PCA has filed a separate petition to intervene in a related proceeding, Docket TG-220243 In re Application of: Jammie’s Environmental, Inc.

14 For the foregoing reasons, Packaging Corporation of America respectfully petitions the Commission for leave to intervene in this proceeding.

15 Dated this 18th day of May 2022.

Dawn Blancaflor
Attorney at Law

/s/ Dawn Blancaflor, ISBA No. 4958
For Packaging Corporation of
America